

1 Leeor Neta, *admitted pro hac vice*
2 *leeor@newmanlaw.com*
3 Jake Bernstein, WSBA No. 39362
4 *jake@newmanlaw.com*
5 Newman Du Wors LLP
6 2101 Fourth Avenue, Suite 1500
7 Seattle, WA 98121
8 Telephone: (206) 274-2800

9 Attorneys for Plaintiffs

10 **UNITED STATES DISTRICT COURT**
11 **EASTERN DISTRICT OF WASHINGTON**

12 RIVER CITY MEDIA, LLC, et al.,

13 Plaintiffs,

14 v.

15 KROMTECH ALLIANCE
16 CORPORATION, et al.,

17 Defendants.

Case No. 2:17-cv-00105-SAB

**DECLARATION OF LEEOR NETA
IN SUPPORT OF RIVER CITY
MEDIA, LLC'S OPPOSITION TO
DEFENDANT CXO MEDIA,
INC.'S MOTION FOR
PROTECTIVE ORDER**

Hearing Date: Feb. 5, 2018, 6:30 p.m.
Without Oral Argument

18 I, Leeor Neta, make the following declaration based upon my own personal
19 knowledge:

20 1. I am an attorney representing Plaintiffs in this matter and am
21 personally familiar with the facts of the case.

22 2. Plaintiffs requested discovery related to the relationships between the
23 Defendant entities and their leadership team; the revenue generated through the
24 sale of CXO's products or services in the US and Washington; and the number of
25 visitors and subscriptions to CXO's website from the state of Washington. A true
26 and correct copy of Plaintiff's Requests for Production and Interrogatories, and
27 CXO's Responses thereto, is attached hereto as Exhibit A.

28 3. By searching the internet Plaintiffs have been able to locate a variety of

1 information about Defendants, including certain information they requested in
2 their Interrogatories and Requests for Production.

3 4. At the Scheduling Conference held on 11/28/2017, the Court
4 informed the parties that it was not inclined to grant a protective order because the
5 Federal District Court is a public forum and its business should be conducted
6 publicly unless a compelling reason exists to keep the proceedings or details of the
7 proceedings confidential.

8 5. CXO's Motion cites to the ROKSO database compiled by the
9 Spamhaus Project. This database is owned and operated by an ideologically
10 opposed source located in the United Kingdom that regularly fails to verify its facts
11 prior to publication and that recklessly labels businesses as "spammers" with no
12 regard for American law.

13
14 I declare under penalty of perjury that the foregoing is true and correct.
15 Executed the 19th day of January, 2018 at San Francisco, California.

16
17 
18 Leeor Neta

CERTIFICATE OF SERVICE

I hereby certify that on January 19, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Attorneys for Defendants International Data Group, Inc., CXO Media, Inc. and Steve Ragan

Kevin J. Curtis
WINSTON & CASHATT
601 W. Riverside, Ste. 1900
Spokane, WA 99201
kjc@winstoncashatt.com

Charles L. Babcock
William J. Stowe
Jackson Walker L.L.P.
1401 McKinney Street, Suite 1900
Houston, TX 77010
cbabcock@jw.com
wstowe@jw.com

Attorneys for Kromtech Alliance Corp.

Amy McGowan Smith
Matthew D. Brown
Cooley LLP
1355101 California Street, 5th Floor
San Francisco, CA 94111
amsmith@cooley.com
brownmd@cooley.com

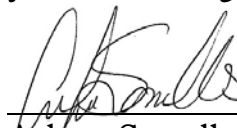
Christopher B. Durbin
Cooley LLP
1700 Seventh Avenue, Suite 1900
Seattle, WA 98101
cdurbin@cooley.com

Attorneys for Defendant Chris Vickery

Aaron Rocke
Rocke Law Group, PLLC
101 Yesler Way, Suite 603
Seattle, WA 98104
aaron@rockelaw.com

Edward Charles Chung
Chung, Malhas & Mantel PLLC
1511 Third Avenue, Suite 1088
Seattle, WA 98101
Echung@cmmlawfirm.com

I declare under penalty of perjury that the foregoing is true and correct.



Arlyne Sorrells
Paralegal